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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND  
MALAMATENIA MAVROMATIS,

Defendants.

Case No.CR-21-00162-WHO

**STIPULATION TO CONTINUE  
STATUS CONFERENCE FROM  
OCTOBER 19, 2023 AT 1:30 PM TO  
NOVEMBER 30, 2023 AT 1:30 PM, AND  
EXCLUDE TIME UNDER THE  
SPEEDY TRIAL ACT; AND  
[PROPOSED] ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from  
October 19 2023, at 1:30 p.m. to November 30, 2023, at 1:30 p.m. Defendant BABAK  
BROUMAND is in custody in the Central District of California, serving a 72-month sentence,

STIPULATION AND [PROPOSED] ORDER  
*United States v. Broumand, et al;*  
Case No. CR-21-00162-WHO

1 after being convicted at jury trial in *United States v. Broumand*, 20-224-RGK(A). Defendant  
2 MALAMANTENIA MAVROMATIS is not in custody.

3 1. Defendant BABAK BROUMAND is in custody in the Central District of  
4 California after being convicted at jury trial in the related case of *United States v. Broumand*,  
5 20-224-RGK(A).  
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7 2. The government has produced over 60,000 pages of discovery to defendant  
8 MAVROMATIS, which primarily consists of business records, including bank, credit card,  
9 mortgage broker, title company, and escrow company records, tax returns, and witness  
10 interview reports.  
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12 3. On March 24, 2022, the government obtained a superseding indictment in this case  
13 adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in  
14 which she was charged with two counts of False Statements on a Loan Application in  
15 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's  
16 indictment, co-defendant BABAK BROUMAND had already been charged.  
17

18 4. Counsel for both defendants agree that additional time is needed for meaningful  
19 preparation for trial, including additional research and investigation, and discussions with their  
20 clients and the government regarding possible pretrial resolution. The parties are currently  
21 engaged in earnest pretrial resolution discussion that may obviate the need for trial. The  
22 government expects to extend a proposed global disposition in the coming weeks. Thus, both  
23 defendants agree more time is needed to receive, review, and advise their clients on the  
24 government's proposed global disposition in this matter.  
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1           5. The government and counsel for the defendants agree that time be excluded under  
2 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in  
3 pretrial resolution discussions.  
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5           6. The parties stipulate and agree that excluding time until November 30, 2023, will  
6 allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties  
7 further stipulate and agree that the ends of justice served by excluding the time from October  
8 19, 2023, through November 30, 2023, from computation under the Speedy Trial Act outweigh  
9 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),  
10 (B)(iv).  
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12           7. The parties are also discussing resolution of this entire matter and require more time  
13 to discuss different settlement alternatives. The parties believe that they are close to reaching  
14 a pretrial resolution.  
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1 8. The undersigned Assistant United States Attorneys certify that they have obtained  
2 approval from all counsel to file this stipulation and proposed order.

3 IT IS SO STIPULATED.

4 DATED: October 18, 2023

/s/ Michael J. Morse  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

8 DATED: October 18, 2023

/s/ Steven F. Gruel  
STEVEN F. GRUEL  
Counsel for Defendant BROUMAND

12 DATED: October 18, 2023

/s/ Paul H. Nathan  
PAUL H. NATHAN  
Counsel for Defendant MAVROMATIS

15 [PROPOSED] ORDER

16  
17 Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
18 the Court hereby continues the status conference from October 19, 2023, at 1:30 p.m. to  
19 November 30, 2023, at 1:30 p.m.

20 Furthermore, the Court finds that failing to exclude the time from October 19, 2023,  
21 through November 30, 2023, would unreasonably deny defense counsel and the defendant the  
22 reasonable time necessary for effective preparation, taking into account the exercise of due  
23 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).  
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25 The Court further finds that the ends of justice served by excluding the time from  
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1 October 19, 2023, through November 30, 2023, from computation under the Speedy Trial Act  
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and  
3 with the consent of the parties,  
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5 IT IS HEREBY ORDERED that the time from October 19 2023, through November  
6 30, 2023, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
7 3161(h)(7)(A), (B)(iv).  
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9 IT IS SO ORDERED.  
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12 DATED:

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HONORABLE WILLIAM H. ORRICK  
United States District Court  
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